

EXHIBIT 31

USCG Due Diligence Report - Individual



DDR Name: Jeffrey Epstein ~
 DDR Type: REVISED
 DDR Status: Process Completed

Banker Information

Banker: Paul V Morris/JPMCHASE
 LE/OU: 102/29338
 Banker SID: N256838
 Banker BAC: 8634--CHBG
 Banker FNEN: 01

Banker History:

03/04/2010 11:08:12 PM - CRD / Notrix changed: Banker from Mary C Casey/JPMCHASE to Paul V Morris/JPMCHASE.
 07/28/2006 11:00:04 PM - CRD / Notrix changed: Banker from Jeffrey M Matusow/JPMCHASE to Mary C Casey/JPMCHASE.
 07/15/2006 11:00:44 PM - CRD / Notrix changed: Banker from Mary C Casey/JPMCHASE to Jeffrey M Matusow/JPMCHASE.
 07/10/2006 11:00:44 PM - CRD / Notrix changed: Banker from Robert Baynard/JPMCHASE to Mary C Casey/JPMCHASE.
 07/07/2006 11:00:21 PM - CRD / Notrix changed: Banker from Jeffrey M Matusow/JPMCHASE to Robert Baynard/JPMCHASE.
 06/24/2006 11:00:45 PM - CRD / Notrix changed: Banker from Mary C Casey/JPMCHASE to Jeffrey M Matusow/JPMCHASE.
 01/19/2006 11:00:30 PM - CRD / Notrix changed: Banker from Mary Rieth/JPMCHASE to Mary C Casey/JPMCHASE.
 04/22/2005 10:10:28 PM - CRD / Notrix changed: Banker GID from 00000043917 to U043917.

DM ID Link Information

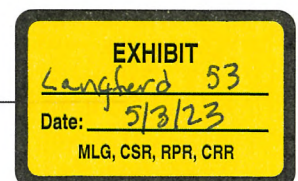
The DM for this DDR is DM Name -JEFFREY E EPSTEIN CAS ID - 9710670708.
 The following DDR's are associated with this Decision Maker .

DDR Name	Banker	Security Services Search Date
116 East 65th St., LLC	Morris, Paul V	02/02/2009
Darren K. Indyke PLLC	Morris, Paul V	10/17/2008
EMMCAC, LLC	Morris, Paul V	02/08/2004
Epstein, Jeffrey	Morris, Paul V	08/06/2004
Financial Trust Company, Inc.	Morris, Paul V	03/07/2011
Financial Trust Company, Inc.	Morris, Paul V	08/11/1999
Freedom Air International, Inc.	Morris, Paul V	05/21/2003
HBRK Associates Inc.	Morris, Paul V	03/11/2010
Hyperion Air, Inc.	Morris, Paul V	10/17/2008
I-Correct.com LLC	Morris, Paul V	02/03/2009
Indyke, Darren K	Morris, Paul V	01/30/2009
Jege, Inc.	Morris, Paul V	01/15/2010
LYN & JOJO LLC	Morris, Paul V	02/03/2009
MAX Foundation	Morris, Paul V	07/31/2006
New York Strategy Group, LLC	Morris, Paul V	02/08/2004
Plan D, Inc.	Morris, Paul V	12/10/2009
The 2007 Jeffrey E Epstein Insurance Trust #2 - November 1, 2007	Morris, Paul V	04/16/2003
The 2007 Jeffrey E Epstein Insurance Trust #3 dtd November 1, 2007	Morris, Paul V	01/30/2009
The 2007 Jeffrey E. Epstein Insurance Trust #1 Dtd November 1, 2007	Morris, Paul V	12/01/2008
The C.O.U.Q. Foundation, Inc.	Morris, Paul V	12/02/2008
The Haze Trust	Morris, Paul V	11/25/2008
		01/28/2004

Name/Contact Information

- ☐ New Client (No Decision Maker/UCAS/PCN Exists)
☒ Existing Client (Decision Maker/UCAS/PCN Exists)
☐ Prospect (must be converted to a client prior to the account opening.)

JPMC Internal Use Only



Confidential

JPM-SDNYLIT-00036570

Backlog Client



Relationship Activity Summary - Jeffrey Epstein - 9710670708 - 2010.pdf

Is this DDR being used for multiple entities?

☐ Yes ☒ No

Last Name: Epstein


First Name: Jeffrey

Middle Name/Initial:

Previous Last Name(s):

Title:

Business Name: J. Epstein & Co.
(To Record Individual's Ownership Or Employer)

 Addresses	Primary Address (Legal address on account)	Business Address (Other than Primary Address)
Name:	Jeffrey Epstein	
Attention:	c/o HBRK Associates	
Address Line 1:	301 East 66th Street, Suite 10B	
Address Line 2:		
City:	New York	
State:	NY	
Province:		
Postal/Zip Code:	10065	
Country:	USA	UNITED STATES

Legal Entity: Individual / Joint

Industry Code: PRIVATE HOUSEHOLDS
NAIC Code: 814100

Citizenship: USA

Date of Birth: [REDACTED]
(Use 4-digit year)

Gender: Male

Tax ID #: [REDACTED]
Remember to collect W-8's or other applicable tax forms for each jurisdiction.Passport/Drivers
License #:

Home Phone: ()-

Introduction Information

Introduction Type: Other

Specific Information: Jeffrey Epstein is an existing client.

Met With Principal? ☒ Yes ☐ NoIf you did not meet the Principal, give an indication of why you haven't met the individual and when you will.
N/AWhat form of government issued identification document did you obtain for the files?
Driver's License

Financial Information

Occupation, Business or Employer of the Client:	Money manager
Net Worth of Client:	\$ 300 (USD millions)
Documentation/ Information obtained to confirm stated net worth of the Client:	accounts held at JPM, knowledge of ownership of certain assets, and public articles
Source Of Wealth:	Other
Please Describe:	Epstein has made his wealth managing money for wealthy individuals
Other	
(Provide detailed and specific information)	Epstein managed money for wealthy individuals, most notably Leslie Wexner until 02/08.

Transaction Profile/Expected Account Activity

What is the purpose/intended use of this account?	Operational/household checking accounts and custody account to hold money market funds.
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Please select each "Product Type" that applies. Within each product type, please check ALL transaction types that apply and provide a description of expected account activity. (document expected sources of inflows and destinations of transfers,countries, and types of payors/payees.Include where is the money coming from - example : A specific bank or firm and purpose of specific transactions, if known)

Product Type - Select all that apply	Transaction Types - Select all that apply and expected activity level (L = 1-5, M = 6-12, H =>12 transactions per month)	Anticipated \$ Amount Totals per month - Please provide at least an estimate
Deposit/Current Accounts (Checking, Savings, Money Market) <input checked="" type="radio"/> Yes <input type="radio"/> No	Cash (withdrawals/deposits) - <input type="radio"/> Low <input checked="" type="radio"/> Medium <input type="radio"/> High	\$10000 to \$25000
	Check deposits / Check paid - <input type="radio"/> Low <input checked="" type="radio"/> Medium <input type="radio"/> High	\$500000 to \$1MM
	Wire Incoming & Outgoing - <input type="radio"/> Low <input checked="" type="radio"/> Medium <input type="radio"/> High	\$1MM to \$5MM
	Internal Transfers - <input type="radio"/> Low <input checked="" type="radio"/> Medium <input type="radio"/> High	\$1MM to \$5MM
	Other - <input type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High	
Please describe in detail expected account activity for this product :		Account is used for maintenance of his various homes and lifestyle expenses; not unusual for the client to pull cash out up to \$50K. Personal accts. are primarily funded from Mr. Epstein's personal investment entity (which invests mostly in JPM MM Funds).
Investment Products (Custody,Brokerage,Agency,Margin) <input checked="" type="radio"/> Yes <input type="radio"/> No	Cash (withdrawals/deposits)- <input type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High	
	Check deposits / Check paid - <input type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High	
	Wire Incoming & Outgoing - <input checked="" type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High	Below \$1MM
	Internal Transfers - <input checked="" type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High	\$1MM to \$5MM
	Purchase & Sells - <input type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High	

Other <input type="radio"/> Low <input type="radio"/> Medium <input type="radio"/> High		
Please describe in detail expected account activity for this product :		Custody account currently holds a money market fund.
Fiduciary (Investment Mgmt. / Trust) <input type="radio"/> Yes <input checked="" type="radio"/> No		
Credit type facilities (Line of Credit, Mortgage, Letter of Credit) <input type="radio"/> Yes <input checked="" type="radio"/> No		

Required Security Services Checks

Security Search Type: Full

Note for Security Services: Please update with any new information since the last search was conducted. Please include all information as this will be the primary DDR that will be used for annual review for Jeffrey Epstein.

Please list any specific search requests/instructions to Security Services here

Security Services Information

A Security Services Check is REQUIRED for New Clients and Prospects
 This section to be completed by the Security Services Group:

List Individuals and Corporate Entities Investigated:

Please Note: All research is subject to the availability of electronic database resources.

Attachment:



Search Type	Is Further Review by Banker Required?	Security Service Details:	Banker Response:
Company Information	No	Information not confirmed; details included in the attachment. Reference section of the DDR titled "Red Dot (derogatory information) identified:" to view the specifics on the adverse information GS&I has identified for this account	
Corporate Records	No	No records were found.	
Other Database Searches (RDC/CDC/MIS)	No	No RDC/CDC/MIS records were found. Sex Offender: Information confirmed; details included in the attachment. ----- CSSS: Information confirmed; details included in the attachment. Reference section of the DDR titled "Red Dot (derogatory information) identified:" to view the specifics on the adverse information GS&I has identified for this account.	
Civil Court Action	No	No records were found.	
Federal & State Court Action	No	No records were found.	
Personal Particulars	No	No additional research necessary.	
Publications	No	Information confirmed; details included in the attachment. Reference section of the DDR titled "Red Dot (derogatory information) identified:" to view the specifics on the adverse information GS&I has identified for this account.	
Regulatory Sanctions	No	No records were found.	

OFAC/Control List Search	No	No records were found.	
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Has this been identified as a Red Dot DDR? : ☒ Yes ☐ No

Red Dot (derogatory information) Identified:

Red Dot information is any derogatory information identified by Global Security Services which warrants the attention of the banker. The presence of "Red Dot" information does not necessarily mean that an existing relationship will be exited or a potential client relationship not pursued. The banker should document any conversations that have taken place with the client/prospect, if any, with regard of the issue and whether or not this impacts his/her, or management's decision to continue with or accept the person/entity as a client.

Security Service Details (Include DDR names in which this was previously reported, if any)	Proceed with or maintain the client relationship Yes / No	Banker Response (If "Yes", please provide your rationale for proceeding with or maintaining the client relationship. If "No", please specify steps that will be taken)
<p>The following information was previously reported to Mary C Casey on 09/21/2006 under the account YHS, LLC (DDR # 7391/06):</p> <p>Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail.</p> <p>As of 3/4/2011:</p> <p>Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls.</p> <p>Jeffrey Epstein is required to register as a sex offender.</p> <p>Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.</p> <p>MC2 Model Management received \$1 million from Epstein in 2005. It is unknown if the money was given as a secret investment or payment for services as a procurer.</p> <p>Jean Luc Brunel, owner of MC2 Model Management and Jeffrey Epstein engaged in racketeering that involved luring in minor children for sexual play for money. In addition, Brunel was a frequent passenger on Epstein's private jet and often visited Epstein in jail.</p> <p>MC2 Model Management was issued a citation by the Florida Business and Professional Regulation for acting as a talent agent without a license.</p> <p>MC2 Model Management LLC has two outstanding federal tax liens totaling \$593,789 (\$443,728 + \$150,061).</p>	<input checked="" type="radio"/> Yes <input type="radio"/> No	As per internal discussions

Expense No.:	99/137001
Total Costs:	\$0.00
Signed by:	Ashish S Patel
Dated:	03/07/2011 01:25:02 PM

Individual Checks

Background Check	Date (Required If Check Carried Out)	Comments (Required If Check Carried Out)
<input checked="" type="checkbox"/> Morgan Network	02/12/2009	Jeffrey Epstein is an existing client of PB. In years past, he was an active brokerage client, particularly foreign

		exchange, and as of this year he is a custody-only client. Formerly, Jeffrey Epstein was a money manager for high net individuals, most notably Leslie Wexner. Wexner was a JPM client and then retained Epstein as his advisor in the late 90s. Mr. Wexner terminated his relationship with Epstein in 02/2008.
		Epstein is well known to several JPM PB employees and to Jes Staley. The purpose of this DDR is to refresh our due diligence on Mr. Epstein. Mr. Epstein was convicted of a felony charge in 2008. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a PB client.
<input type="checkbox"/> TRW/CIC		
<input type="checkbox"/> Lexis Nexis		
<input type="checkbox"/> Dun_Bradstreet		
<input type="checkbox"/> Bank References		
<input type="checkbox"/> Directories		
<input type="checkbox"/> Bus Social Contacts		
<input type="checkbox"/> Other		

Summary

Summary Of Findings:

Jeffrey Epstein is an existing client of PB. In years past, he was an active brokerage client. Formerly, Jeffrey Epstein was a money manager for high net worth individuals, most notably Leslie Wexner. Wexner was a JPM client and then retained Epstein as his advisor in the late 90s. Mr. Wexner terminated his relationship with Epstein in 02/2008.

Mr. Epstein is well known to several JPM PB employees and to Jes Staley. Mr. Epstein was convicted of a felony charge in 2008 and was to serve an 18-month prison sentence. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a client.

6-18-10: Mr. Epstein is currently serving out his house arrest. Our view is that Mr. Epstein has served his time and completing his duties to society. We are assessing the situation closely and monitoring the occasional news stories regarding Mr. Epstein and civil lawsuits. Mr. Epstein is managing his own personal wealth.

January 27, 2011 update: A few news stories during 2010 connects Jeffrey Epstein to human trafficking. The coverage team along with Catherine Keating and William Langford all met to discuss the situation and agreed to enhance monitoring and document a discussion with the client. Jes Staley discussed the topic with Jeffrey Epstein who replied there was no truth to the allegations, no evidence and was not expecting any problems. We will continue to monitor the accounts and cash usage closely going forward.

Anticipated Product(s)

Custody
Deposits

Number Assignments

Standalone Entity?

☐ Yes ☒ No

If this legal entity is or will be a Client (PCN) or Prospect answer YES.

If this legal entity is or will be part of an Existing PCN relationship answer NO.

If "No" above, then indicate the Client (PCN):
Ultimate Customer Number (UCN):

1405152
9710670708

Optionally, you may
indicate the Affiliation Number:

SPN Required?
SPN#:

☐ Yes ☒ No

1405152

CAS ID:

9710670708

Approval Information

Public/High Profile Figure Yes

If a Public/High Profile figure,
please select one of the following:

Other

If other please describe:

Convicted Felon

- Public/High Profile Figures: Explain the individual's position as/association with a senior political official/prominent person

High Risk Jurisdiction No

High Risk Business No

Banker: Paul V Morris/JPMCHASE

LE/OU: 102/29338

Senior Manager: Marcus Sheridan/JPMCHASE

Area Head: Catherine Keating/JPMCHASE

Annual / Periodic Review Information

Annual/Periodic Review 12 months
Due in:

This annual/periodic review is for DMID # 9710670708 - DMID Name: JEFFREY E EPSTEIN
The actual review is being conducted within the Ranch Lake III, Inc. DDR.

Banker Approval Information

Sponsorship affirmation -

Based on my due diligence and the information provided, I approve and accept sponsorship of Jeffrey Epstein ~ as a Client from inception and throughout the client relationship.

Paul V Morris 03/07/2011 02:37:45 PM

Senior Manager Approval Information

Based on the information provided and the approval granted by Paul V Morris, I approve the acceptance of Jeffrey Epstein ~ as a Client.

Marcus Sheridan 03/29/2011 10:44:53 AM

Area Head Approval Information

Based on the information provided and the approval granted by Paul V Morris and Marcus Sheridan, I approve the acceptance of Jeffrey Epstein ~ as a Client

Catherine Keating 04/14/2011 04:55:58 PM

Quality Reviewer Information

1st Quality Review Comment: Bonnie K Perry on 1/12/2009 10:23:42 AM Comments : Ok to approve.

2nd Quality Review Comment: Bonnie K Perry on 6/9/2010 2:42:34 PM Comments : DDR needs to include more up to date information as to Mr. Epstein's current circumstances.

3rd Quality Review Comment: Bonnie K Perry on 6/28/2010 1:42:40 PM Comments : Exceptions have been addressed. Review of account activity did not reveal anything out of the ordinary.

Personal accounts are typically funded from Jeffrey Epstein's investment entity and then Mr. Epstein disburses money to various other accounts used in support of his homes, legal fees, insurance, etc. Ok to approve.

4th Quality Review Comment: Bonnie K Perry on 4/1/2011 5:22:43 PM Comments : DDR was updated to include additional information with regard of the client's situation. Accts. are being closely monitored by AML Ops.

5th Quality Review Comment:

Admin Comments

Admin Comments:	DDR would not allow annual review. There is an error message that another DDR within the relationship is already undergoing annual review, therefore this DDR did not produce an annual review alert in February as it should have.
By:	Bonnie K Perry/JPMCHASE
Date:	04/09/2010 06:19:17 PM

Admin Comments History :

Document History

Created: 05/12/2003	By: Mary Rieth
Last Modified: 04/14/2011	By: Catherine Keating
Submitted: 03/29/2011 10:44:53 AM	By: Marcus Sheridan

Audit History

38. 'Area Head Approval' performed by: Catherine Keating on: 04/14/2011 04:56:13 PM
 37. Quality Review performed by: Bonnie K Perry on: 04/01/2011 05:22:48 PM
 36. 'Senior Manager Approval' performed by: Marcus Sheridan on: 03/29/2011 10:44:53 AM
 35. Button: 'Change Senior Manager' performed by: Bonnie K Perry on: 03/07/2011 04:31:17 PM
 34. 'Banker Approval' performed by: Paul V Morris on: 03/07/2011 02:37:48 PM
 33. Submitted for Banker Approval SS Type = Full performed by: Ashish S Patel on: 03/07/2011 01:25:05 PM
 32. Changed DDR Status from: Awaiting Banker Approval to Awaiting Security Services Research performed by: Mary E Meisner on: 03/07/2011 12:07:48 PM
 31. Submitted for Banker Approval SS Type = Full performed by: John J O'reilly on: 03/04/2011 04:30:08 PM
 30. Button: 'Flag: Security Check has begun' performed by: John J O'reilly on: 03/04/2011 04:29:39 PM
 29. Button: 'Print' performed by: Ligaya X Felismino-Stesner on: 02/22/2011 04:10:12 PM
 28. Submitted for Security Services Approval performed by: Paul V Morris on: 02/22/2011 02:35:45 PM
 27. Button : 'Update/Revise DDR' performed by: Paul V Morris on: 02/22/2011 02:21:53 PM
 26. Area Head Approved on Behalf of Catherine Keating because designated Area Head is Confirmed with Catherine on 7/9/10 performed by: Dustin F Kennedy on: 07/09/2010 03:00:18 PM
 25. Quality Review performed by: Bonnie K Perry on: 06/28/2010 01:42:58 PM
 24. Changed DDR Status from: Awaiting Banker Approval to Awaiting Area Head Approval performed by: Bonnie K Perry on: 06/28/2010 01:38:01 PM
 23. Changed DDR Status from: Awaiting Area Head Approval to Awaiting Banker Approval performed by: Bonnie K Perry on: 06/28/2010 01:32:45 PM
 22. 'Senior Manager Approval' performed by: Mary C Casey on: 06/18/2010 12:57:11 PM
 21. 'Banker Approval' performed by: Paul V Morris on: 06/18/2010 12:11:19 PM
 20. Changed DDR Status from: Awaiting Senior Manager Approval to Awaiting Banker Approval performed by: Bonnie K Perry on: 06/09/2010 03:05:18 PM
 19. Quality Review performed by: Bonnie K Perry on: 06/09/2010 02:42:42 PM
 18. 'Banker Approval' performed by: Paul V Morris on: 06/08/2010 01:34:50 PM
 17. Submitted for Banker Approval SS Type = Full performed by: Viktoriya X Ignatenko on: 04/16/2010 10:12:12 AM
 16. Button: 'Print' performed by: Javia S Hairston on: 04/12/2010 10:39:27 AM
 15. Submitted for Security Services Approval performed by: Bonnie K Perry on: 04/09/2010 06:17:44 PM
 14. Button : 'Update/Revise DDR' performed by: Bonnie K Perry on: 04/09/2010 06:14:18 PM
 13. 'Area Head Approval' performed by: Catherine Keating on: 02/24/2009 09:02:12 AM
 12. 'Senior Manager Approval' performed by: Marcus Sheridan on: 02/12/2009 06:31:53 PM
 11. 'Banker Approval' performed by: Mary C Casey on: 02/12/2009 01:26:59 PM
 10. Changed DDR Status from: Awaiting Area Head Approval to Awaiting Banker Approval performed by: James Dalessio on: 01/12/2009 03:40:22 PM
 9. Quality Review performed by: Bonnie K Perry on: 01/12/2009 10:23:52 AM
 8. 'Senior Manager Approval' performed by: Marcus Sheridan on: 12/16/2008 12:58:02 PM
 7. 'Banker Approval' performed by: Mary C Casey on: 12/12/2008 12:40:38 PM
 6. Submitted for Banker Approval SS Type = Full performed by: Matthew P Hynson on: 12/10/2008 02:06:23 PM
 5. Button: 'Flag: Security Check has begun' performed by: Ligaya X Felismino-Stesner on: 12/02/2008 02:20:42 PM
 4. Button: 'Print' performed by: Ligaya X Felismino-Stesner on: 12/02/2008 02:18:15 PM
 3. Submitted for Security Services Approval performed by: Mary C Casey on: 12/02/2008 01:58:52 PM
 2. High Risk Business set to 'No' because Epstein is a high profile/controversial figure (as noted) but does not run a high risk business. - performed by: Mary C Casey on: 12/02/2008 01:56:23 PM
 1. Button : 'Update/Revise DDR' performed by: Mary C Casey on: 12/02/2008 11:58:59 AM

Converted Tracking Document History:

1. Client Manager Approval by: Mary Rieth on 05/28/2003 08:34:02 AM.
2. Senior Manager Approval by: Tad C Smith on 05/28/2003 09:04:12 AM.
3. Awaiting Security Services Research by: Mary Rieth on 05/14/2003 11:15:48 AM.
4. Security Services Sign-Off by: Vanessa A Budhu on 05/21/2003 10:25:48 AM.



